

FILED

UNITED STATES DISTRICT COURT
for the

Western District of Texas

February 07, 2025
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Myrna Gallegos
DEPUTY

United States of America)
vs)
Yair Alejandro Aguilar-Flores)
Angel Eduardo Carrillo-Carrillo)
Jorge Alfredo Lopez-Acevedo)
Jesus David Reyes-Villagran)
<hr/>	
Defendant(s)	

Case No. **EP-25-MJ- 513 -ATB**
(1,2,3,4)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 4, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

Charge 1: 8 U.S.C. 1324 (a)(1)(A)(v)(I),
(a)(1)(A)(i), and (a)(1)(B)(i)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others known and unknown, to commit offenses against the United States, namely: knowing that a person is an alien, intentionally brought to and attempted to bring to the United States in any manner whatsoever such person at a place other than a designated port of entry, regardless of whether such alien has received prior official authorization to come to, enter, and reside in the United States.

Charge 2: 8 U.S.C. 1324(a)(1)(A)(v)(I),
(a)(1)(A)(ii) and (a)(1)(B)(i)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others known and unknown, to commit offenses against the United States, namely: knowing and in reckless disregard of the fact that an alien has come to, entered, and remained in the United States in violation of law, did transport, move, and attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of said violation of law.

This criminal complaint is based on these facts:

Charge #1: DEFENDANT 1: Yair Alejandro Aguilar-Flores; DEFENDANT 4: Jesus David Reyes-Villagran
Charge #2: DEFENDANT 2: Angel Eduardo Carrillo-Carrillo; DEFENDANT 3: Jorge Alfredo Lopez-Acevedo

See Attached

Continued on the attached sheet.



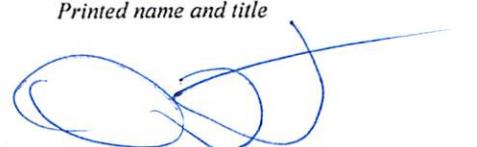
Complainant's signature

Luis E. Rodriguez, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: February 7, 2025



Judge's signature

City and state: El Paso, Texas

Anne T. Berton, U.S. Magistrate Judge

Printed name and title

Complaint sworn to telephonically on
February 07, 2025 at 12:59 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

CONTINUATION OF CRIMINAL COMPLAINT**WESTERN DISTRICT OF TEXAS**

**DEFENDANT 1: Yair Alejandro AGUILAR-Flores; DEFENDANT 2: Angel Eduardo Carrillo-Carrillo
DEFENDANT 3: Jorge Alfredo Lopez-Acevedo; DEFENDANT 4: Jesus David Reyes-Villagran**

PEPT# PEPT250200188

02/07/2025

FACTS (CONTINUED)

On February 4, 2025, Ysleta Border Patrol Station's Disrupt Unit agents (YDU) were conducting surveillance at a Motel located at the 900 block of North Yarbrough Drive in El Paso, Texas, which is located in the Western District of Texas. The YDU agents began conducting surveillance knowing this location is often used to house illegal aliens.

During their surveillance, a YDU agent observed a white Hyundai Santa Fe (Santa Fe) enter the motel's parking lot and observed and noted a Texas temporary license plate. The YDU agent observed the driver park the Santa Fe, walk into the Motel lobby and shortly afterward return to the Santa Fe and drive away. In previous illegal alien smuggling schemes, the YDU agent had encountered, alien smugglers use temporary license plates to avoid detection. Additionally alien smuggler's often rent motel rooms to harbor illegal aliens and will later return to the Motel to feed harbored illegal aliens or pay for the room. The YDU agent conducted vehicle record checks on the Santa Fe's temporary license plate and discovered the Santa Fe had recently traveled through various U.S. Border Patrol Checkpoints. Furthermore the Santa Fe had been observed at various hotels known for being used to harbor illegal aliens.

Shortly after the departure of the Santa Fe, one of the YDU agents conducting surveillance observed three individuals departing from room 229. The YDU agent observed all three individuals appeared cautious, peeking from the doorway and looking from side to side as they exited. The YDU agent observed one of the exiting individual's boots were very dirty. The YDU agents, approached them as they were getting into a blue Kia Sorento. The Kia Sorento had temporary license plates as well. Both YDU agents displayed their government issued badges and identified themselves as United States (U.S.) Border Patrol agents. The YDU agents then advised the three individuals in the Kia Sorento that they were conducting an immigration investigation and asked the individuals of what country they were citizens of. The individual sitting in the driver's seat of the vehicle, later identified as Yair Alejandro AGUILAR-Flores, hereinafter referred to as DEFENDANT 1, stated he was a citizen of Mexico and that he had a B1/B2 Visa, which was no longer valid, and he stated he did not have the card in his possession. When questioned DEFENDANT 1, admitted he was living in the U.S. illegally. DEFENDANT 1 was then placed under arrest. The other two passengers were then questioned as to their citizenship. Angel Eduardo CARRILLO-Carrillo, hereinafter referred to as DEFENDANT 2, and Jorge Alfredo LOPEZ-Acevedo, hereinafter referred to as DEFENDANT 3, were both determined to be illegally present in the U.S. DEFENDANT 2 and DEFENDANT 3 were then placed under arrest. DEFENDANT 2 was advised of and waived his Miranda Rights. DEFENDANT 2 verified he and DEFENDANT 1 and DEFENDANT 3 had exited room 229. DEFENDANT 2, acknowledged there were other illegal aliens inside the room. DEFENDANTS 1,2, 3 were transported to the Ysleta Border Patrol station (YST), for processing and disposition, and DEFENDANT 1, AND DEFENDANT 3, were read their Miranda Rights at YST.

YDU agents approached room number 229 to conduct an investigatory inquiry. The YDU agents knocked on the door of room 229, and an individual, opened the door. The YDU agents observed through the open

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

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FACTS (CONTINUED)

doorway multiple individuals sitting on the beds and noticed the strong smell of wet clothing and body odor emanating from the room. The YDU agents displayed their government issued badges and identified themselves as U.S. Border Patrol agents. The individual who opened the door was asked for and granted YDU agents' permission to enter the room. The YDU agents encountered 7 additional individuals. All 8 individuals found in room 229 were determined to be illegally present in the U.S. All eight individuals were placed under arrest.

During these arrests a YDU agent observed DEFENDANT 1, and DEFENDANT 3 were receiving phone calls from the same number. This added to the YDU agents' belief that DEFENDANTs 1, 2, and 3 were involved in an alien smuggling scheme as smugglers are often the only ones allowed to possess phones and remain in contact with additional smugglers.

The YDU agents were concluding their investigation into alien smuggling at the Motel when they observed an individual, Jesus David REYES-Villagran hereinafter referred to as DEFENDANT 4, approach and knock at the door of room 229. The YDU agent who had earlier been conducting surveillance recognized this individual as the driver of the Santa Fe. YDU agents displayed their government issued badges and asked DEFENDANT 4 if the room belonged to him, and DEFENDANT 4 stated the room was his. DEFENDANT 4 was determined to be illegally present in the U.S. DEFENDANT 4 was advised of and waived his Miranda Rights. DEFENDANT 4 stated to YDU agents, the room was his rented under his name. DEFENDANT 4 was asked regarding any occupants in room 229, and he replied to YDU agents there were multiple individuals inside the room. DEFENDANT 4 was asked if he had transported any illegal aliens to any other hotels and admitted he had just dropped off five individuals at a Hotel on the west side of El Paso and provided an address and room number of the location to agents. This information resulted in the arrest of 5 illegal aliens.

DEFENDANT 2 provided the following post Miranda statements. He stated he was offered work by guiding groups into the U.S., and that he would be paid \$300 dollars. He stated the first time he guided 3 illegal aliens and this time it was 4. He was asked if he knew it was illegal to guide the group of illegals, he stated yes, he did but he needed the money. He stated DEFENDANT 1 was going to take him to a Port of Entry to return to Mexico. He stated DEFENDANT 1 picked him up the first time he crossed a group. He was asked if he has communication with DEFENDANT 1 on his phone and stated yes, he does.

DEFENDANT 3 provided the following post Miranda statements. He stated he brought in 4, they were the 4 that were inside the room with him. He stated he was going to be paid \$300 dollars per person. He was asked who brought him to the hotel after picking up, he stated, the guy with a beard who drives the white car. He was asked if the two guys who were arrested today are pickup drivers, he stated yes. He was asked where he was headed when he was apprehended in the blue car, the Kia Sorento, and he stated he was going back to Juarez.

DEFENDANT 4 provided the following post Miranda statements. He stated he has picked up illegal immigrants

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

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FACTS (CONTINUED)

4 times and has taken illegal immigrants 3 times to Albuquerque. He stated he was called and sent GPS coordinates to go and pick up, about 1 hour east from El Paso, Texas and he was in communication with the foot guide, he picked up the foot guide and 4 other illegals and took them to the Motel room 229. He stated the other 5 illegal aliens found in the room are the ones that the other driver picked up. He was asked if he had DEFENDANT 1 on his Whatsapp, he stated DEFENDANT 1 is one of his contacts under a nickname. He was asked who rented Room 229, he stated it was under his name. He stated he already got paid for today's illegal aliens. He stated he gets \$100 dollars per person when he picks them up and \$150 dollars per person when he takes them to Albuquerque. DEFENDANT 4 was given a six-pack photo lineup and identified DEFENDANT 1 as the one who picked up the other 5 illegal aliens found in room 229.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

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FACTS (CONTINUED)

Immigration History:

DEFENDANT 1: None

DEFENDANT 2: None

DEFENDANT 3: has been Removed 1 time, the last one being to MEXICO on December 24, 2024, through El Paso, Texas

DEFENDANT 4 has been granted 1 voluntary departure and 4 departures under Operation Catio, Title 42, the last on October 14, 2021, through SANTA TERESA, NM

Criminal History:

DEFENDANT 1: 05/16/2020, Arkansas, Driving While Intoxicated - DWI 1st(M), ACC, Disposition not provided.

DEFENDANT 1: 05/10/2024, Tontitown, Arkansas, WARRANT(M), ACC, Failure to Appear.

DEFENDANT 1: 06/10/2024, Gentry, Arkansas, WARRANT(M), ACC, Violation of a Court Order.

DEFENDANT 2: None

DEFENDANT 3: None

DEFENDANT 4: None